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February 9, 2012

Mr. Christopher Whyrick  
Senior Campaign Finance Analyst  
Reports Analysis Division  
Federal Election Commission  
999 E Street, NW  
Washington, DC 20463

RE:Response to RFAI on 2010 Year End Report  
League of Conservation Voters, Inc.: C90005786 (LCV)

Dear Mr. Whyrick:

The following is in response to your letter of January 5, 2012 regarding certain independent expenditures made by the League of Conservation Voters, Inc. (LCV) during the fourth quarter of 2010.

1.You requested information regarding a 48-hour report filed by LCV on October 11, 2010 disclosing an independent expenditure of \$4,995 on October 10, 2010 and an explanation as to why it did not appear on LCVs 4th Quarter report. While the attachment to your letter indicates that this expense was related to Paul Hodes, LCVs records confirm that this independent expenditure was made in support of Tom Perriello. On October 11, 2010, LCV filed with the FEC a 48-hour report disclosing an estimated independent expenditure to Mission Control for \$4,995 as part of our efforts to support the candidacy of Tom Perriello. However, this estimated \$4,995 payment was never actually spent because Mission Control had over-estimated the costs (LCV separately reported two payments to Mission Control on its 4th Quarter report). As a result, the \$4,995 was not reported on LCVs Year-End report filed on January 31, 2011. LCV would note that Form 5, unlike Form 3X, does not report ongoing receipts/disbursements or reconciliation, nor does it instruct filers to list voided transactions previously reported on 24/48 reports.

2.You have requested information regarding 14 independent expenditures reported on LCVs 4th Quarter 2010 Form 5 report in relation to 24 and 48 hour reports. We provide an individual response to each below, but to summarize:

a.In five instances, LCV correctly reported the information as part of a 24 or 48 hour report or did not report the expense on a 24 or 48 hour report because no such reporting threshold had been triggered.

b.In four instances, the expenses were disclosed to the FEC and the public on 24 or 48 hour reports, but due to administrative errors these disclosures were incorrectly reported by LCVs connected PAC, the League of Conservation Voters Action Fund (LCV Action Fund). Once these issues were identified, LCV correctly reported the expenses as part of LCVs 4th Quarter Form 5 report. While these issues were identified shortly after the election, since RAD does not encourage filing amended 24 hour reports after an election, LCV determined that it should report the correctly characterized amounts on its subsequent quarterly report.

c.In five instances, smaller independent expenditures amounting to an aggregate total of \$2442.17 tied to LCV canvass operations were not reported on 24-hour reports. This failure to report small independent expenditures pertaining to pizza, parking, and allocations of partial salaries for joint canvass operations is attributable to administrative oversights on LCVs part that did not become apparent until after the time for filing the reports was passed. Once these issues were identified, LCV correctly reported the expenses on its 4th Quarter Form 5 report. While these issues were identified shortly after the election, since RAD does not encourage filing amended 24 hour reports after an election had occurred, LCV determined it should report missed expenses on its subsequent quarterly report.

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